

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE: '318 PATENT LITIGATION

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:
: Civil Action No. 05-356 (KAJ)
: (Consolidated)
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DEFENDANT TEVA PHARMACEUTICALS USA, INC.'S
AND TEVA PHARMACEUTICAL INDUSTRIES LTD.'S NOTICE OF 30(b)(6)
DEPOSITION TO PLAINTIFFS JANSSEN PHARMACEUTICA N.V.,
AND JANSSEN, L.P.

PLEASE TAKE NOTICE THAT, beginning on May 23, 2006 at 9:30 A.M. at the offices of Kirkland & Ellis, 655 Fifteenth Street, N.W., Washington, D.C. 20005, Defendants Teva Pharmaceuticals U.S.A., Inc. and Teva Pharmaceutical Industries Ltd., ("the Teva Defendants"), will take the deposition of Plaintiffs Janssen Pharmaceutica N.V. and Janssen, L.P., (collectively, "Janssen") as represented by the person(s) most knowledgeable with respect to the subject matter topics identified below and designated to testify on behalf of Janssen Pharmaceutica N.V. and/or Janssen, L.P., pursuant to Federal Rule of Civil Procedure 30(b)(6). The oral examination will be taken before a notary public or other person authorized to administer oaths, and will be recorded by stenographic means and/or videotape. The deposition will continue from day to day until completed with such adjournments as to time and place as may be necessary. You are invited to attend and participate.

The Teva Defendants serve this Notice without waiver of their objections to the deficiencies in Janssen's document production and other discovery responses concerning the

subject matter of the instant Notice, and reserve the right to continue this deposition as necessary in light of any subsequent document production by Janssen.

TOPICS

1. The facts and circumstances under which Janssen first became aware of the article, P.A. Bhasker, *Medical Management of Dementia*, THE ANTISEPTIC, 71(1): 45-47 (1974), including how Janssen learned of it, who was involved in this first awareness, and any evaluation of it conducted by or on behalf of Janssen, then or subsequent to the time Janssen became aware of it.

2. Any evaluation, consideration, or discussion conducted by Janssen to market a galantamine drug product for the treatment of Alzheimer's disease and/or related dementias, including the names and responsibilities of all persons who were involved in the evaluation, consideration, or discussion.

3. The decision to file an application with the U.S. Food and Drug Administration ("FDA") seeking approval to manufacture and sell a galantamine drug product for the treatment of Alzheimer's disease and/or related dementias.

4. Each and every contribution and/or input that Janssen, or any employee or agent of Janssen has made to the preparation, decision to file, filing and/or prosecution of Janssen's IND and/or NDA, including without limitation any information relating to regulatory procedures and strategies for obtaining regulatory approval of a galantamine drug product for the treatment of mild to moderate Alzheimer's disease and/or related dementias.

5. The facts and circumstances regarding Janssen first becoming aware of galantamine as a treatment for Alzheimer's disease, including without limitation the date on which this occurred and the people involved.

6. The facts and circumstances regarding Janssen first becoming aware of U.S. Patent No. 4,663,318 ("the '318 patent"), including without limitation the date on which this occurred and the people involved.

7. Any consideration or evaluation by Janssen of licensing the '318 patent to any unlicensed party.

8. The factual basis for Janssen's belief that the Teva Defendants engaged in any licensing activity with Dr. Bonnie Davis or Synaptech.

9. Any documents related to the foregoing topics that were either not produced in this case or destroyed and the circumstances under which the documents were withheld from production or destroyed, the identification of all persons with knowledge of the documents and/or their contents, and, in the case of documents destroyed, the dates of the destruction.

10. Janssen Pharmaceutica N.V.'s document retention policies from 1986 to the present.
11. Janssen, L.P.'s document retention policies from 1986 to the present.
12. The identity and location of documents and things concerning the foregoing topics.
13. Persons knowledgeable regarding subject matter of the foregoing topics.

Respectfully submitted,

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Dated: May 9, 2006

CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on May 9, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the counsel of record:

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I further certify that on May 9, 2006, I caused a copy of the foregoing document to be served on the above-listed counsel of record in the manner indicated and on the following non-registered participants in the manner indicated:

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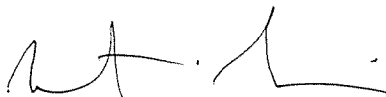
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